

1 GEORGE P. KELESIS, ESQ.
2 Nevada Bar No. 000069
3 COOK & KELESIS, LTD.
4 517 South Ninth Street
5 Las Vegas, Nevada 89101
6 Phone: (702) 737-7702
7 Fax: (702) 737-7712a
8 E-mail: gkelesis@bckltd.com

9 Sunethra Muralidhara
10 Nevada State Bar No. 13549
11 Wright Marsh & Levy
12 300 S. Fourth St. Ste. 701
13 Las Vegas, Nevada 89101
14 (702) 382-4004
15 smuralidhara@wmlawlv.com
16 Attorneys for Mr. Raul Gil

17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAUL GIL,

Defendant.

Case No.: 2:22-cr-00147-APG-EJY

STIPULATION TO CONTINUE
SENTENCING
(Second Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, Eric C. Schmale, Assistant United States Attorney, Thomas W. Flynn and Jacob M. Green, Trial Attorneys, as counsel for the United States of America, and George P. Kelesis and Sunethra Muralidhara, as counsel for the defendant, Raul Gil, that the sentencing in the above-captioned matter, currently scheduled for February 2, 2023 at 9:00 AM, be vacated and

continued to April 5, 2023¹ or another date convenient to this Court.

This Stipulation is entered into for the following reasons:

1. Defendant is out of custody and does not object to the continuance.
2. Counsel for the Government will be out of the district and not available on the current date set for sentencing.
3. The parties need additional time to determine their positions regarding sentencing, gather and prepare support for their positions, file sentencing memoranda, and prepare for argument.
4. The parties agree to the continuance.
5. The additional time requested by this Stipulation is made in good faith and not for purposes of delay.

This is the second request for continuation of the sentencing hearing.

DATED this 20th day of December 2022.

COOK & KELESIS, LTD.

JASON M. FRIERSON
UNITED STATES ATTORNEY

By: /s/ George Kelesis
GEORGE P. KELESIS, ESQ.
Nevada Bar No. 000069
Counsel for Defendant Gil

By: /s/ Eric Schmale
Eric C. Schmale
Assistant United States Attorney

/s/ Sunethra Muralidhara
Sunethra Muralidhara
Nevada Bar No. 013549
Counsel for Defendant Gil

/s/ Thomas Flynn
THOMAS W. FLYNN
JACOB M. GREEN
Trial Attorney

¹ The parties have communicated with the Court's Clerk, who advised that the April 5th date is available on this Court's calendar. If this date is still convenient to the Court, the parties request that sentencing be rescheduled on this day, after 11:00 AM (PST), as defense counsel has sentencing in another matter currently set before Judge Navarro at 10:00 AM. Alternatively, the parties are available any day from April 18, 2023 to April 22, 2023, preferably in the afternoon.

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

Case No.: 2:22-cr-00147-APG-EJY

4 Plaintiff,

5 v.

6 RAUL GIL,

7 **ORDER CONTINUING**
SENTENCING HEARING

8 Defendant.

9
10 Based on the Stipulation of counsel and for good cause appearing, the Court hereby
11 continues the sentencing of Defendant Raul Gil in this matter. The ends of justice served by
12 granting said continuance outweigh the best interest of the public and the Defendant in a speedy
13 sentencing because:


14 1. Defendant is out of custody and does not object to the continuance.

15 2. Counsel for the Government will be out of the district and not available on the
16 current date set for sentencing.

17 3. The parties need additional time to prepare for sentencing effectively and
18 thoroughly.

19 4. The parties agree to the continuance.

20
21 IT IS THEREFORE ORDERED that the sentencing in the above-captioned matter,
22 currently scheduled for February 2, 2023 at 9:00 AM is vacated and continued to the April 5,
23 2023 at 1:30 p.m. in Courtroom 6C.

24
25 
26 HONORABLE ANDREW P. GORDON
27 UNITED STATES DISTRICT JUDGE
28 Dated: December 21, 2022